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Attorneys for Defendant
PAYPAL, INC.,

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

LENA EVANS, RONI SHEMTOV, and
SHBADAN AKYLBKOV, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

PAYPAL, INC., a Delaware corporation; and
DOES 1-25, inclusive,

Defendants.

No. 5:22-cv-00248-BLF

**STIPULATION TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE (L.R. 6-2, 16-2)**

Hon. Beth Labson Freeman

Date Action Filed: January 13, 2022
Trial Date: None Set

1 TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS
2 OF RECORD:

3 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Local Rule 6-1(a) of
4 the Northern District of California Civil Local Rules, Plaintiffs Lena Evans, Roni Shemtov, and
5 Shabdan Akylbekov ("Plaintiffs") and Defendant PayPal, Inc. ("Defendant"), by and through
6 their respective counsel, hereby stipulate as follows:

7 WHEREAS, Plaintiffs filed a complaint in the above-entitled action in the United States
8 District Court, Northern District of California on January 13, 2022;

9 WHEREAS, on February 14, 2022, this action was reassigned to the Honorable Beth
10 Labson Freeman as it is related to *Cheng v. PayPal, Inc.*, Case No. 21-cv-03608 (Dkt. Nos. 17-
11 18);

12 WHEREAS, On February 23, 2022, this Court set the Initial Case Management
13 Conference for May 26, 2022 at 11:00 a.m. (Dkt. # 19);

14 WHEREAS, on March 16, 2022, Defendant PayPal, Inc. ("PayPal") filed a Motion to
15 Compel Arbitration (Dkt. # 20);

16 WHEREAS, PayPal's Motion to Compel Arbitration is set for hearing on May 26, 2022 at
17 9:00 a.m.;

18 WHEREAS, PayPal contends that its contractual rights to arbitrate Plaintiff's claims
19 would be violated if PayPal were required to engage in substantive litigation of the dispute,
20 including through Rule 26 Initial Disclosures and other discovery;

21 WHEREAS, the Parties agree that continuing the Initial Case Management Conference to
22 a date after the Court has ruled on PayPal's Motion to Compel Arbitration would be efficient and
23 preserve the Court's and the parties' resources ,because the Court's ruling will define the proper
24 scope of discovery and litigation before this Court;

25 Now therefore, the Parties by and through their counsel of record, stipulate and agree that,
26 subject to the Court's approval, the Initial Case Management Conference shall be continued to a
27 date and time convenient for the Court at or after June 16, 2022.

28 IT IS SO STIPULATED.

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Respectfully submitted,

Dated: April 29, 2022

DENTONS US LLP

By: /s/Judith Shophet Sidkoff
Judith Shophet Sidkoff

Attorneys for Defendant
PAYPAL, INC.,

Dated: April __, 2022

THE BENSAMOCHAN LAW FIRM, INC.
SCHREIBER AND SCHREIBER, INC.
ERIC BENSAMOCHAN

By: /s/
Ean Matthew Schreiber
Eric Andrew Schreiber
Eric Bensamochan

Attorneys for Plaintiffs
LENA EVANS, RONI SHEMTOV, AND
SHBADAN AKYLBEKOV

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

In accordance with Civil Local Rule 5-1, I attest that concurrence in the filing of this document has been obtained from the other signatories, which shall serve in lieu of their signatures on the document.

Dated: April 29, 2022

DENTONS US LLP

By: /s/Judith Shophet Sidkoff
Judith Shophet Sidkoff

Attorneys for Defendant
PAYPAL, INC.,